

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

TRENT JERMAINE PRESLIE

CASE NUMBER: **5:05-mj-00079 TAG**

## CRIMINAL COMPLAINT

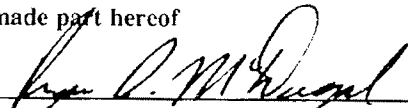
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about and between September 21, 2005 and September 27, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
\_\_\_\_\_  
Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 29, 2005

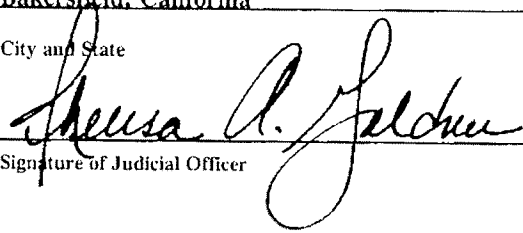
at

Bakersfield, California

Date

City and State

U.S. Magistrate Judge Theresa A. Goldner  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Trent Jermaine Preslie

AFFIDAVIT

I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents.

On 09/26/2005 I responded to the Red Cross call center for victims of hurricane Katrina at 401 34th Street, Bakersfield, California, upon receiving complaints of possible fraud related to relief funds. Hurricane Katrina is a natural disaster that occurred in the Gulf Coast region of the United States earlier in September of 2005. The hurricane caused extensive damage to the Gulf Coast region. As a result of that damage, and related losses, numerous relief agencies have participated in collecting and distributing disaster relief funds for legitimate victims that have been displaced by Hurricane Katrina and are in need of funds. A large portion of those funds are administered and distributed by the Red Cross.

The call center in Bakersfield is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center is manned by temporary workers employed by Spherion, a staffing services company.

The purpose of the call center is to disperse relief funds to victims who were in the direct path of the hurricane, and who had to evacuate their homes. When victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. Victims are verified when their pre-disaster address is within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code call center employees are instructed to check the victim's address in Choicepoint to validate it.

If it is determined that they are eligible for relief victims are given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money victims are provided is determined by the size of their

family. A single victim is entitled to \$360, whereas a family of five or more is entitled to \$1565. The funds are intended to assist displaced victims with day-to-day living expenses, rather than pay for actual property damage or loss.

On 09/28/2005, at 1:45pm, I began to enter a Western Union store located in Bakersfield to conduct follow-up investigation. Prior to entering the store, I received a telephone call on my cellular telephone from Western Union security informing me of the presence of a subject who was posing as a hurricane Katrina victim in order to fraudulently obtain relief funds. I was informed that the subject was currently in the store attempting to conduct a fraudulent transaction. As I was finishing the telephone call the store manager exited the store and informed me that the defendant was inside the store and he was trying to collect money from a previous wire transfer of funds provided by the Red Cross for Hurricane Katrina victims. As I entered the store the manager pointed to the defendant and said, "that's him." I then confronted the defendant and identified myself as an FBI Special Agent. I asked the defendant if I could ask him some questions, whereupon the subject turned and ran toward the exit. Before the defendant was able to exit the store, I subdued him. The defendant is identified as TRENT PRESLEY, date of birth 5/26/1972.

After arresting PRESLEY, I interviewed employees involved in the transaction. I learned that the defendant had been in the store on 09/27/2005 and had collected three checks in the approximate total amount of \$1265 that represented funds from a Red Cross wire transfer related to Hurricane Katrina relief funds. Those funds were transmitted in and involving interstate commerce from the Red Cross in the form of three checks. I have been informed and believe that the Red Cross maintains its Hurricane Katrina funds at its bank located in Chicago, Illinois.

On 9/28/05 while interviewing store employees I was informed that the defendant had cashed two of the three checks at another location in Kern County and was attempting to cash the remaining check, in the amount of \$500, at this Western Union Store.

I was further informed that the defendant then returned on 09/28/2005, in order to cash the remaining check from the transfer. At that time the store manager realized that the wire transfer from the day before was fraudulent and contacted the Western Union security department. The security department then contacted me on my cellular telephone as I was about to enter the store.

I have been informed by Red Cross and Western Union representatives that the actual claim submitted/received by

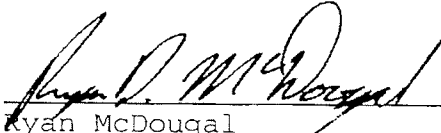
defendant PRESLEE was in the name of Michael Hitt. Your affiant has contacted the wife of Hitt and has been informed that they (Hitt and his wife) have no knowledge of or acquaintance with Jermaine Preslie in Bakersfield, California. Additionally, they have not granted permission to Preslie to obtain Hurricane Katrina relief funds in their name.

During this investigation a state parole officer was interviewed and informed law enforcement officers participating in this investigation that the defendant was currently on parole and being supervised by authorities in Kern County. Information was also provided which established the defendant was not residing in Louisiana or other areas affected by Hurricane Katrina and therefore, was not entitled to Hurricane Katrina Relief from Red Cross. Specifically, the parole agent informed investigators that the defendant is on parole in the State of California and is not entitled to leave the state absent permission from his parole officer. Such permission has not been requested or granted. Additionally, the defendant is required to check with his parole officer regularly and last checked in with his parole officer approximately two weeks ago. It should be noted that the defendant was not released from prison in California until approximately August 20, 2005. Hurricane Katrina struck the United States between approximately August 25 and August 29, 2005. According to the probation officer, after the defendant was released from prison he resided at the La Mirage Hotel at 525 Union Avenue, Bakersfield, California. A parole search was performed at the location on September 28, 2005, and the defendant's belongings were located therein.

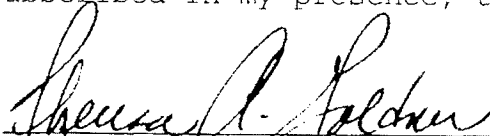
Based on the above information I believe that probable cause exists to conclude that on September 27, 2005 Trent Presley received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, Trent Jermaine Preslie, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this <sup>29</sup>~~30~~th day of September, 2005. *las*

  
Theresa A. Goldner  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

AMINAH RANDLE

CASE NUMBER: *5:05-mj-00082 TAG*

CRIMINAL COMPLAINT

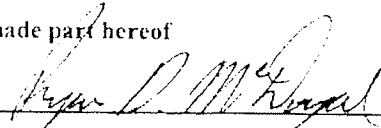
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about and between September 21, 2005 and September 27, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof



Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 30, 2005

at

Bakersfield, California

Date

City and State

Theresa A. Goldner, U.S. Magistrate Judge

Theresa A. Goldner

Name and Title of Judicial Officer

Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Aminah Randle

AFFIDAVIT

1. I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed me that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross officials that funds are transferred from the Red Cross bank account in Chicago,

Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed me that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed me that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed me that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed me that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named person's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed me that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.



PROBABLE CAUSE FOR NAMED DEFENDANT: AMINAH RANDLE

12. On or about September 29, 2005, I obtained an employment file for AMINAH RANDLE (hereinafter RANDLE) from officials at SPHERION, which is the staffing services company subcontracted by the Red Cross to provide individuals to work the Red Cross call center located in Bakersfield, California, as described above.

13. One of the items I located related to RANDLE'S employment file was entitled "Application for Employment" in the name of AMINAH RANDLE. I have been informed by officials at SPHERION that all individuals working the call center must fill out an application for employment prior to working at the call center. According to the application located in RANDLE'S employment file, which includes a signature of RANDLE, she has lived at 501 Taylor Street, #44, Bakersfield, California, from January 2004 to September 15, 2005. According to that same application, RANDLE resided at various locations in Bakersfield, California, from January 1990 to the present. Nowhere in the application does RANDLE claim or otherwise indicate that she ever lived within the areas designated by the Red Cross as those affected by Hurricane Katrina, or that she was in any way an eligible claimant to receive Hurricane Katrina funds from the Red Cross. It should also be noted that during the course of this investigation I have learned that at least two other individuals also involved in submitting or causing similar fraudulent claims to the Red Cross call center in Bakersfield, California, have used the address of 501 Taylor Street, #44, Bakersfield, California as their residence address. Based upon such information, I believe that RANDLE was not a Hurricane Katrina victim and, therefore, was not eligible to receive relief funds from the Red Cross.

14. During this investigation I have reviewed records maintained by the Red Cross call center in Bakersfield. One of these records was entitled "Case Detail by User ID." I have been informed by Red Cross officials that transactions conducted by each call center employee are recorded on the Case Detail By User ID (hereinafter Case User) printout. I have also been informed that each employee/call center employee, including RANDLE, is assigned a user name and password that identifies them on the Case User printout. It should be noted that the universal password provided to employees is the same for each employee and remains the same unless changed by the individual user.

15. Upon review of Red Cross records, including Case User ID records for RANDLE, I discovered that RANDLE had created at least two victims account in her own first and last name and one

victim account in the name of Tonjua RANDLE. It should be noted that the name "Tonjua RANDLE" is listed on AMINAH RANDLE's employment application as person to contact in case of emergency. I have been informed by officials at the Red Cross call center that employees of the call center are instructed not to fill out or file claims on behalf of family members or themselves. By creating each of these accounts, RANDLE was able to obtain a unique identifying number or PIN number that was intended to be used by a Hurricane Katrina victim to obtain financial relief from Western Union, as set forth above. As previously noted, when such PIN number is provided to Western Union, the holder of that PIN number would be able to obtain Hurricane Katrina relief funds as described above. Based upon a review of Red Cross and Western Union records I determined that many of the PIN numbers caused to be created by RANDLE have been submitted to Western Union for payment and payment has been issued for such numbers.

16. Upon review of the Red Cross records I learned that RANDLE also created victim disbursement accounts for approximately 15 claims that were distributed in Bakersfield, California. The names associated with these addresses/claims include some of the following names: Candice Brown, Robert Johnson and Tonjua RANDLE, as well as Aminah RANDLE. Based upon information I have learned in this on-going investigation, each of those names are associated with similar false and fraudulent claims submitted to the Red Cross call center in Bakersfield, California as described above.

17. During the course of this investigation I learned that at least one of the allegedly fraudulent claimant accounts established was still outstanding and had not been presented to Western Union for payment. After learning this information, I contacted officials at Western Union and requested they notify me as soon as the outstanding account was presented for a claim. Western Union officials informed me that, based upon my request, they would put an alert on the outstanding claim number and notify me when it was presented.

18. On September 29, 2005, I was contacted by Western Union officials who informed me that AMINAH RANDLE was currently at at Western Union outlet located in a Fastrip store in Bakersfield, and was attempting to pick up the aforementioned claim.

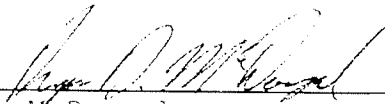
19. After receiving notification from Western Union of the claim, investigating agents immediately responded to the involved Western Union outlet. There agents contacted and subsequently arrested a female identified as AMINAH RANDLE who was the individual Western Union officials indicated had presented a claim for payment on behalf of RANDLE.

20. I have also reviewed a printout provided by Red Cross officials of RANDLE's user activity while working at the call center. According to that information, which is the Case Detail by User ID described above, between September 15, 2005, and September 20, 2005, RANDLE was responsible for processing approximately 15 separate disbursement payment claims that were retrieved by individuals in Bakersfield, California. One of these claims (Case number 1-11850373) was in the name of Aminah RANDLE. It was in the amount of \$1,565. As set forth above, that amount represents the maximum relief payment available from the American Red Cross for Hurricane Katrina victims. That amount is the amount that would be paid for a person claiming to represent a family of five victims.

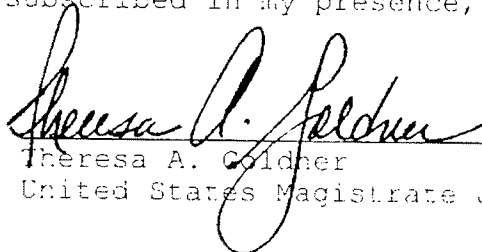
Based on the above information I believe that probable cause exists to conclude that on September 29, 2005 AMINAH RANDLE received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, AMINAH RANLDE, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 30th day of September, 2005.

  
\_\_\_\_\_  
Theresa A. Goldner  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

ROBERT JOHNSON

CASE NUMBER: **5:05-mj-00081 TAG**  
**CRIMINAL COMPLAINT**

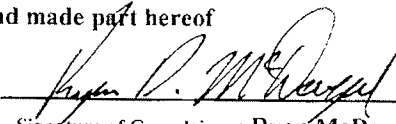
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about and between September 21, 2005 and September 27, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof



Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 30, 2005

at

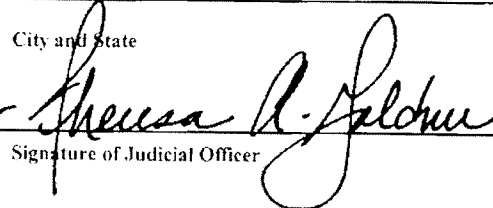
Bakersfield, California

Date

City and State

U.S. Magistrate Judge Theresa A. Goldner

Name and Title of Judicial Officer



Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Robert Johnson

AFFIDAVIT

1. I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed me that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross officials that funds are transferred from the Red Cross bank account in Chicago,

Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed me that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed me that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed me that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed me that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed me that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: ROBERT JOHNSON

12. On or about September 29, 2005, I obtained an employment file for ROBERT JOHNSON (hereinafter JOHNSON) from officials at SPHERION, which is the staffing services company subcontracted by the Red Cross to provide individuals to work the Red Cross call center located in Bakersfield, California, as described above.

13. One of the items I located related to JOHNSON'S employment file was entitled "Application for Employment" in the name of ROBERT JOHNSON. I have been informed by officials at SPHERION that all individuals working the call center must fill out an application for employment prior to working at the call center. According to the application located in JOHNSON'S employment file, which includes a signature of JOHNSON, he has lived at 501 Taylor Street, #44, Bakersfield, California, from June 2003 to "present," the application was dated September 12, 2005. According to that same application, JOHNSON resided at various locations in Bakersfield, California, from March 1997 to the present. Nowhere in the application does JOHNSON claim or otherwise indicate that he ever lived within the areas designated by the Red Cross as those affected by Hurricane Katrina, or that he was in any way an eligible claimant to receive Hurricane Katrina funds from the Red Cross. It should also be noted that during the course of this investigation I have learned that at least two other individuals also involved in submitting or causing similar fraudulent claims to the Red Cross call center in Bakersfield, California, have used the address of 501 Taylor Street, #44, Bakersfield, California, as their residence address. Based upon such information, I believe that JOHNSON was not a Hurricane Katrina victim and, therefore, was not eligible to receive relief funds from the Red Cross.

14. During this investigation I have reviewed records maintained by the Red Cross call center in Bakersfield. One of these records was entitled "Case Detail by User ID." I have been informed by Red Cross officials that transactions conducted by each call center employee are recorded on the Case Detail By User ID (hereinafter Case User) printout. I have also been informed that each employee/call center employee, including JOHNSON, is assigned a user name and password that identifies them on the Case User printout. It should be noted that the universal password provided to employees is the same for each employee and remains the same unless changed by the individual user.

15. Upon review of Red Cross records, including Case User ID records for JOHNSON, I discovered that JOHNSON created at least one other victim account using the last name of JOHNSON and



residing in Bakersfield, California. By creating this account, JOHNSON was able to obtain a unique identifying number or PIN number that was intended to be used by a Hurricane Katrina victim to obtain financial relief from Western Union, as set forth above. As previously noted, when such PIN number is provided to Western Union, the holder of that PIN number would be able to obtain Hurricane Katrina relief funds as described above. Based upon a review of Red Cross and Western Union records I determined that the PIN number caused to be created by JOHNSON has been submitted to Western Union for payment and payment has been issued for such number.

16. Upon review of the Red Cross records I learned that JOHNSON also created victim disbursement accounts for approximately 7 distributions that were claimed in Bakersfield, California. The names associated with these addresses/claims include some of the following names: Candice Brown, Robert Johnson and Tonjua Randle, as well as Aminah Randle. Based upon information I have learned in this on-going investigation, each of those names are associated with similar false and fraudulent claims submitted to the Red Cross call center in Bakersfield, California as described above. For instance, I have learned and believe that Aminah Randle, who was also a Red Cross Call center employee, also created, submitted and obtained false claims from the Red Cross in Bakersfield, California, in the name of Robert Johnson. Also, I have learned and believe that Candice Brown and Tonjua Randle received payment based upon false claims made to the Red Cross call center in Bakersfield, California.

17. During the course of this investigation I learned that at least one of the allegedly fraudulent claimant accounts established by AMINIAH RANDLE, who, as stated above, was also a call center employee responsible for submitting false claims, was still outstanding and had not been presented to Western Union for payment. After learning this information, I contacted officials at Western Union and requested they notify me as soon as the outstanding account was presented for a claim. Western Union officials informed me that, based upon my request, they would put an alert on the outstanding claim number and notify me when it was presented.

18. On September 29, 2005, I was contacted by Western Union officials who informed me that AMINAH RANDLE was currently at at Western Union outlet located in a Fastrip store in Bakersfield, and was attempting to pick up the aforementioned claim.

19. After receiving notification from Western Union of the claim, investigating agents immediately responded to the involved Western Union outlet. There agents contacted and subsequently arrested a female identified as AMINAH RANDLE who was the

individual Western Union officials indicated had presented a claim for payment on behalf of RANDLE.

20. While contacting RANDLE, agents observed a male who appeared to be waiting outside the Fastrip in a motor vehicle. Upon contacting that individual, he identified himself as ROBERT JOHNSON. Initially, JOHNSON claimed he was waiting for his girlfriend who was inside the Fastrip store. Later, Johnson changed his story, claiming he was waiting for his girlfriend who had not yet arrived at the Fastrip.

21. Another agent also at the Fastrip recognized JOHNSON from a photo he had observed while participating in this investigation. That agent had previously learned that JOHNSON was also a Red Cross call center employee. That agent had previously reviewed records of the Red Cross call center which caused him to believe that JOHNSON was also involved in submitting false claims to the call center. Specifically, the agent had reviewed JOHNSON'S employment records and had determined that, while acting as a call center employee, JOHNSON had created client accounts in the name of AMINAH RANDLE and CANDICE BROWN. Agents were aware that each of those individuals were not entitled to receive Hurricane Katrina relief funds from the Red Cross. During the initial contact with JOHNSON, he informed agents that both BROWN and RANDLE were his girlfriends.

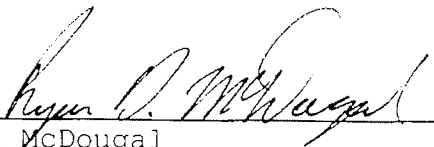
22. I have also reviewed a printout provided by Red Cross officials of JOHNSON'S user activity while working at the call center. According to that information, which is the Case Detail by User ID described above, between September 15, 2005, and September 20, 2005, JOHNSON was responsible for processing approximately 7 separate disbursement payment claims that were retrieved in Bakersfield, California. One of these claims (Case number 1-10800975) was in the name of AMINAH RANDLE. It was in the amount of \$1,565. As set forth above, that amount represents the maximum relief payment available from the American Red Cross for Hurricane Katrina victims. That amount is the amount that would be paid for a person claiming to represent a family of five victims. Based upon this investigation, I learned that AMINIAH RANDLE was also a call center employee and was not eligible to receive relief funds from the Red Cross call center.

Based on the above information I believe that probable cause exists to conclude that on September 29, 2005 ROBERT JOHNSON received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

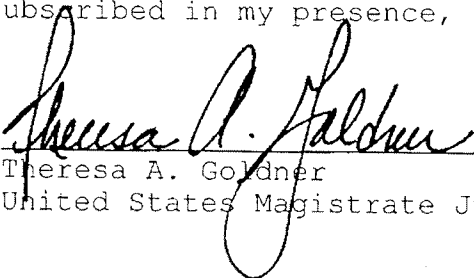
Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that

defendant, ROBERT JOHNSON, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 30th day of September, 2005.

  
\_\_\_\_\_  
Theresa A. Goldner  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

ELIZABETH KAY RAY

CASE NUMBER: *5:05-mj-00085 TAG*

## CRIMINAL COMPLAINT

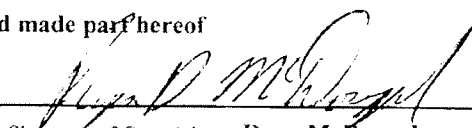
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 16, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses, and did aid and abet the same

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
\_\_\_\_\_  
Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 30, 2005

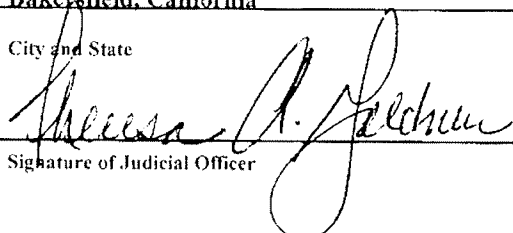
at

Bakersfield, California

Date

City and State

U.S. Magistrate Judge Theresa A. Goldner  
\_\_\_\_\_  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Elizabeth Kay Ray

AFFIDAVIT

1. I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed me that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross officials that funds are transferred from the Red Cross bank account in Chicago,

Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed me that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed me that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed me that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed me that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named person's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed me that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: ELIZABETH RAY

12. On or about September 29, 2005, I obtained an employment file for ELIZABETH RAY (hereinafter RAY) from officials at SPHERION, which is the staffing services company subcontracted by the Red Cross to provide individuals to work the Red Cross call center located in Bakersfield, California, as described above.

13. One of the items I located related to RAY'S employment file was entitled "Application for Employment" in the name of ELIZABETH RAY. I have been informed by officials at SPHERION that all individuals working the call center must fill out an application for employment prior to working at the call center. According to the application located in RAY'S employment file, which includes a signature of RAY, she has lived at 3512 Cardamen Drive, Bakersfield, California, from December 2003 to September, 2005. Nowhere in the application does RAY claim or otherwise indicate that she ever lived within the areas designated by the Red Cross as those affected by Hurricane Katrina, or that she was in any way an eligible claimant to receive Hurricane Katrina funds from the Red Cross.

14. During this investigation I have reviewed records maintained by the Red Cross call center in Bakersfield. One of these records was entitled "Case Detail by User ID." I have been informed by Red Cross officials that transactions conducted by each call center employee are recorded on the Case Detail By User ID (hereinafter Case User) printout. I have also been informed that each employee/call center employee, including RAY, is assigned a user name and password that identifies them on the Case User printout. It should be noted that the universal password provided to employees is the same for each employee and remains the same unless changed by the individual user.

15. Upon review of Red Cross records, including Case User ID records for RAY, I discovered that RAY had created at least one victim account in the name of Larry Wilkerson. It should be noted that the name "Larry Wilkerson" is listed on ELIZABETH RAY'S employment application as a person to contact in case of emergency. Additionally, the phone number listed for Wilkerson matches the phone number that RAY lists on her application as her own home phone number. I have been informed by officials at the Red Cross call center that employees of the call center are instructed not to fill out or file claims on behalf of family members or themselves. By creating this account, RAY was able to obtain a unique identifying number or PIN number that was intended to be used by a Hurricane Katrina victim to obtain financial relief from Western Union, as set forth above. As



previously noted, when such PIN number is provided to Western Union, the holder of that PIN number would be able to obtain Hurricane Katrina relief funds as described above. Based upon a review of Red Cross and Western Union records I determined that at least one of the PIN numbers caused to be created by RAY has been submitted to Western Union for payment and payment has been issued for such numbers. The payment for that PIN number was \$1565.

16. I have also had the opportunity to review ChoicePoint records for Larry Wilkerson. I am informed and believe that the ChoicePoint record I reviewed contains the same information on the ChoicePoint records utilized by the Red Cross call center to verify whether Wilkerson was living in the area affected by Hurricane Katrina and whether he was eligible to receive Red Cross relief funds. The ChoicePoint record I reviewed contained a home address and phone number for Wilkerson. The home address and phone number for Wilkerson listed on the ChoicePoint document matches the home address and phone number that RAY listed on her employment application as both her own address and phone number and the home address and phone number Wilkerson as her emergency contact. Based upon the review of the ChoicePoint records and the information contained therein, which matches the information for Wilkerson contained in Ray's employment application, I believe that Larry Wilkerson was not a person who was eligible to receive Hurricane Katrina relief funds paid by Red Cross and that the Wilkerson claim described herein, that was submitted and caused to be submitted by Ray, was false and fraudulent.

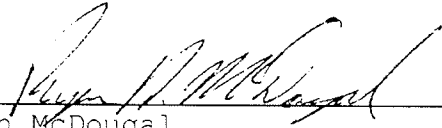
16a. I have also reviewed photographs obtained from the Money Mart at 4117 Ming Avenue, Bakersfield, California. Each of the photographs provided to me is dated September 16, 2005. I have also learned that the Money Mart is a Western Union outlet that distributes cash by and on behalf of Western Union. I have been informed that the funds provided by Red Cross to Western Union for the cash payments made by Western Union are transferred in interstate commerce from the Red Cross bank account in Chicago, Illinois to Western Union. These photographs depict two Western Union checks, each made out to "Larry Wilkerson." One is in the amount of \$1,000 and the other in the amount of \$565. That is the amount of the claim for Larry Wilkerson that Red Cross records indicate was prepared by RAY.

Based on the above information I believe that probable cause exists to conclude that on approximately September 16, 2005, ELIZABETH KAY RAY caused a false and fraudulent claim on behalf of Larry Wilkerson to be submitted to the Red Cross call center in Bakersfield California. I also believe that such claim

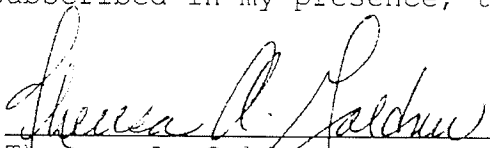
resulted in the payment of such claim by Western Union to a person presenting himself as Larry Wilkerson and, therefore, RAY caused another to receive funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, ELIZABETH KAY RAY, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 30th day of September, 2005.

  
\_\_\_\_\_  
Theresa A. Goldner  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

CANDICE BROWN

CASE NUMBER: **5:05-mj-00083 TAG**

## CRIMINAL COMPLAINT

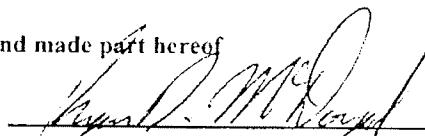
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about and between September 15, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
\_\_\_\_\_  
Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 30, 2005

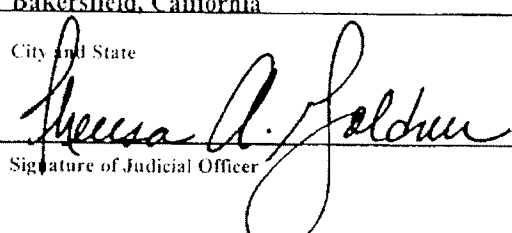
Date

at

Bakersfield, California

City and State

U.S. Magistrate Judge Theresa A. Giddner  
\_\_\_\_\_  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Candice Brown

AFFIDAVIT

1. I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed me that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross officials that funds are transferred from the Red Cross bank account in Chicago,

Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed me that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed me that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed me that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed me that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed me that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: CANDICE BROWN

12. During the course of this investigation I have reviewed photographs provided by or on behalf of the Money Mart store located at 4117 Ming Avenue, Bakersfield, California. Each of the photographs provided to me is dated September 15, 2005. I have also learned that the Money Mart is a Western Union outlet that distributes cash by and on behalf of Western Union.

13. As set forth above, I know that Western Union has arranged with the Red Cross to be a distribution point for relief funds available for Hurricane Katrina relief victims. I also know that in order to be eligible for such funds, a person claiming to be a Hurricane Katrina victim must provide information to the Red Cross establishing that they resided in the area affected by the hurricane during the time of the hurricane. Such information includes the ZIP code of the person claiming to be eligible for relief.

14. Upon review of the photos noted in paragraph twelve above (each dated September 15, 2005), I observed a photograph of an individual who appeared to be CANDICE BROWN. The photograph, which is attached hereto, shows BROWN standing at the Western Union counter. Another photograph, also attached hereto, shows a check made out to "Candice B Brown" in the amount of \$1,000. I was informed by Western Union officials that the check represents payment from the Red Cross intended for Hurricane Katrina victims. The next photograph, also attached hereto, is a California Identification card in the name of "Candice Brown" laying on top of the check depicted in the previous photograph.

15. I also have been informed that the funds represented by the check depicted in the photograph described above are funds provided by the Red Cross that originated from the Red Cross bank account in Chicago, Illinois, and that such funds were transmitted in interstate commerce.

16. I have been informed and believe that CANDICE BROWN, the person depicted in the photograph above cashing a Western Union check representing Red Cross Funds intended for Hurricane Katrina Relief victims was not entitled to receive such funds and that her claim for such funds was false and fraudulent. I believe that BROWN was not a Hurricane Katrina victim, therefore, was not eligible to receive relief funds from the Red Cross. I have reached this conclusion based on the following:

- a. I have examined ChoicePoint records. Essentially, ChoicePoint is a database that maintains identification and property records for individuals. Those records establish that BROWN has resided in Bakersfield on a continuous basis since at least 2003. There is no indication in those records that BROWN ever resided in any area designated by the Red Cross as affected by Hurricane Katrina. Since BROWN did not reside in the affected area, she did not qualify as a Hurricane Katrina victim and therefore was not entitled to receive relief funds from the Red Cross.
- b. The most recent address listed in ChoicePoint for BROWN is 501 Taylor Street, #44, Bakersfield, California. I know that address was utilized by at least two other individuals involved in a scheme to fraudulently obtain hurricane relief funds from the Red Cross. Each of those individuals, Robert Johnson and Aminah Randle, were employed at the Bakersfield Red Cross call center and were responsible for creating client accounts for Hurricane Katrina relief victims. Johnson and Randle also both applied for relief funds for themselves and were not entitled to receive such funds.
- c. I have also determined, based on a review of Red Cross records, that both Robert Johnson and Aminah Randle created client accounts in the name of CANDICE BROWN. Each of those accounts resulted in what the Red Cross records depict as a "successful payment" for funds distributed in Bakersfield, California.

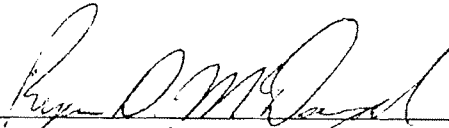
Based on the above information I believe that probable cause exists to conclude that on September 15, 2005 CANDICE BROWN received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, CANDICE BROWN, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a

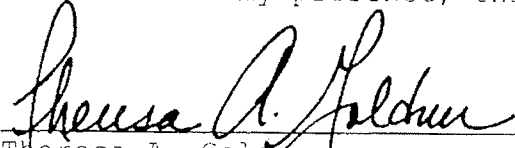


scheme to defraud by the use of interstate communications and aid and abet the same.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

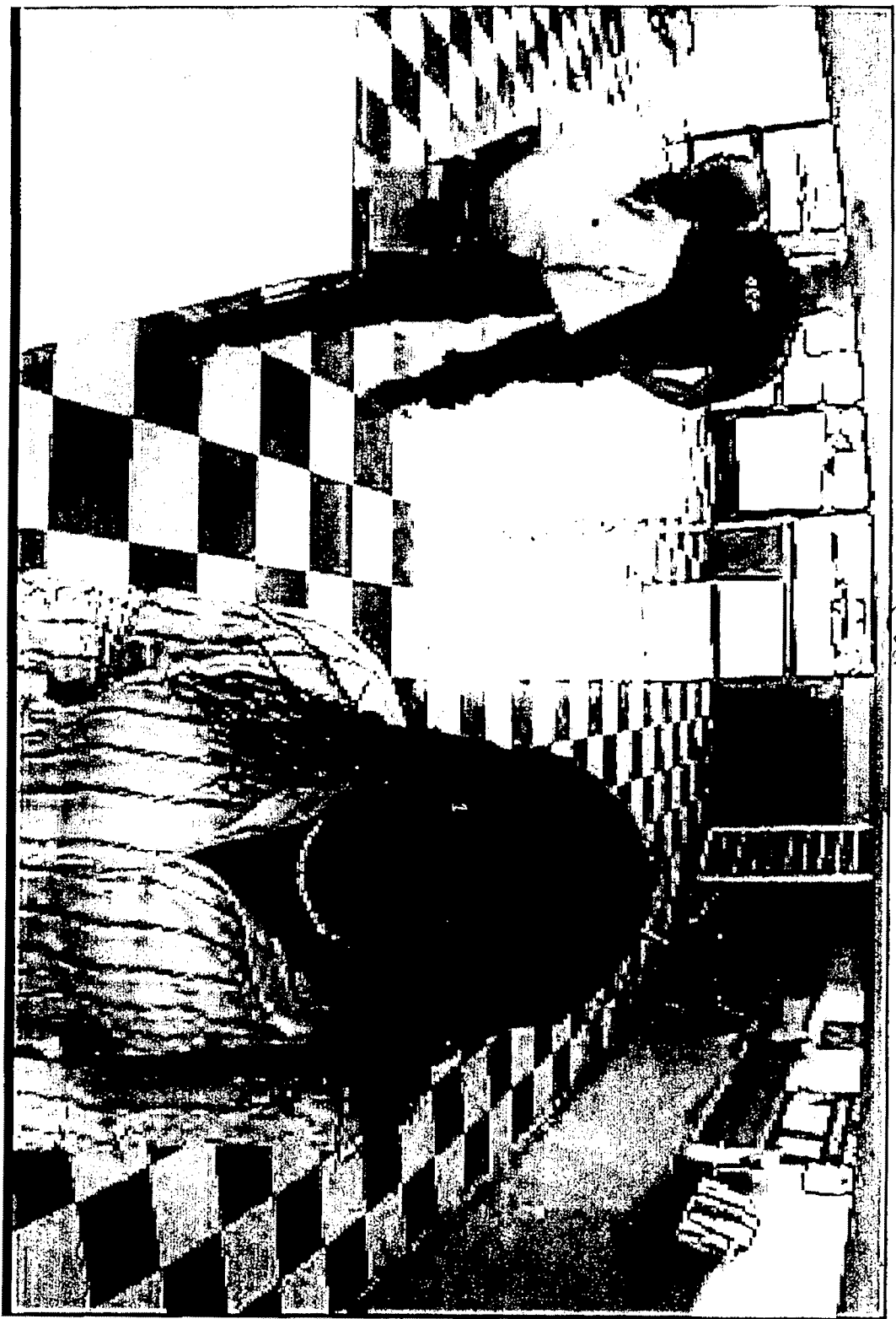
  
\_\_\_\_\_  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 30th day of September, 2005.

  
\_\_\_\_\_  
Theresa A. Goldner  
United States Magistrate Judge

Candice Brown

cell 1  
20032005



Divar name:	DIVAR-01	Camera input:	2
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Date and time:	09-15-2005 09:30:14	Image format:	4:2:2 wavelet compressed
Events:	None	Authenticity:	Image is authentic

**WESTERN UNION**

Issued At

MONEY ORDER NO. 50  
4117 MAIN AVE  
BIRMINGHAM, GA 30602

8821186384

Check No. 1012  
Pay to the Order of CONNORCE MCGINN

09/15/99  
4117 Main  
BIRMINGHAM, GA 30602

The Sum of One Thousand & 00/100ths Dollars  
Cash and Coin  
1012  
0-14-011

09/15/99  
12997670  
1012  
0-14-011

Issued at Western Union Bank Branch Office  
09/15/99

Western Union Financial Services, Inc.  
1012  
0-14-011

121071004001 35483211CB3843

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8321166303

029/17/05

1975 5-17-77 66

CHECKED: \_\_\_\_\_  
PAID TO THE CANDICE BROWN  
ORDER OF

11/17/1997 11:00 AM

5 366-05

**ONLY ONE**

**WORTH INVESTING IN**

**D-14-02**

706-838-0004  
MICH 16-0-016  
VOC # A190000000

Copyright © 1998, Penguin Family Support Association  
Greensboro, N.C. 27404-1000

Pharmaceutical & Pharmaceutical, Chemical & Chemical

07-1689

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# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

TONJUA RANDLE

CASE NUMBER: **5:05-mj-00084 TAG**

**CRIMINAL COMPLAINT**

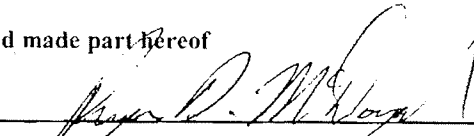
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 21, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
\_\_\_\_\_  
Signature of Complainant Ryan McDougal,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

September 30, 2005

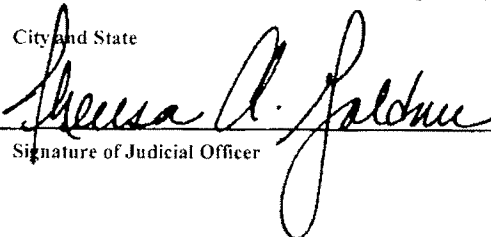
at

Bakersfield, California

Date

City and State

U.S. Magistrate Judge Theresa A. Goldner  
\_\_\_\_\_  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Tonjua Randle

AFFIDAVIT

1. I, Ryan D. McDougal, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed me that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross officials that funds are transferred from the Red Cross bank account in Chicago,

Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed me that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed me that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed me that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed me that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed me that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.



PROBABLE CAUSE FOR NAMED DEFENDANT: TONJUA RANDLE

12. During the course of this investigation I have reviewed photographs provided by or on behalf of the Money Mart store located at 4117 Ming Avenue, Bakersfield, California. Each of the photographs provided to me is dated September 21, 2005. I have also learned that the Money Mart is a Western Union outlet that distributes cash by and on behalf of Western Union.

13. As set forth above, I know that Western Union has arranged with the Red Cross to be a distribution point for relief funds available for Hurricane Katrina relief victims. I also know that in order to be eligible for such funds, a person claiming to be a Hurricane Katrina victim must provide information to the Red Cross establishing that they resided in the area affected by the hurricane during the time of the hurricane. Such information includes the ZIP code of the person claiming to be eligible for relief.

14. Upon review of the photos noted in paragraph twelve above (each dated September 21, 2005), I observed a photograph of an individual who appeared to be TONJUA RANDLE. The photograph, which is attached hereto, shows RANDLE standing at the Western Union Counter. Two additional photographs, also attached hereto, show two checks made out to "Tonjua Randle" in the amounts of \$565 and \$1,000. I was informed by Western Union officials that the check represents payment from the Red Cross intended for Hurricane Katrina victims. The next photograph, also attached hereto, is a California Identification card in the name of "Tonjua Randle" laying on top of one of the checks (in the amount of \$1,000) depicted in the previous photograph.

15. I also have been informed that the funds represented by the check depicted in the photograph described above are funds provided by the Red Cross that originated from the Red Cross bank account in Chicago, Illinois, and that such funds were transmitted in interstate commerce.

16. I have been informed and believe that TONJUA RANDLE, the person depicted in the photograph above cashing a Western Union check representing Red Cross Funds intended for Hurricane Katrina Relief victims was not entitled to receive such funds and that her claim for such funds was false and fraudulent. I believe that BROWN was not a Hurricane Katrina victim, therefore, was not eligible to receive relief funds from the Red Cross. I have reached this conclusion based on the following:

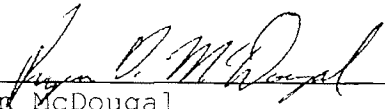
- a. I have examined ChoicePoint records. Essentially, ChoicePoint is a database that maintains identification and property records for individuals. Those records establish that RANDLE has resided in Bakersfield on a continuous basis since at least 2000. There is no indication in those records that RANDLE ever resided in any area designated by the Red Cross as affected by Hurricane Katrina. Since RANDLE did not reside in the affected area, she did not qualify as a Hurricane Katrina victim and therefore was not entitled to receive relief funds from the Red Cross.
- b. I have also determined, based on a review of Red Cross records, that AMINAH RANDLE created the Red Cross client account in the name of TONJUA RANDLE. That account resulted in what the Red Cross records depict as a "successful payment" in the amount of \$1,565 for funds distributed in Bakersfield, California.
- c. I know and believe that AMINAH RANDLE was employed at the Red Cross call center during the time that the client claim was submitted for TONJUA RANDLE. I also know that AMINAH RANDLE is responsible for submitting numerous false claims to the Red Cross call center on her behalf and the behalf of others. Upon review of AMINAH RANDLE's employment application, she lists TONJUA RANDLE as a person to contact in case of emergency. The phone number listed for TONJUA RANDLE is in the 661 area code which I know to be an area code for Kern County, California, and not an area code for any area affected by Hurricane Katrina.

Based on the above information I believe that probable cause exists to conclude that on September 21, 2005, TONJUA RANDLE received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

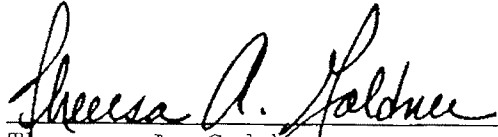
Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, TONJUA RANDLE, has violated Title 18, United States,

Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications and aid and abet the same.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

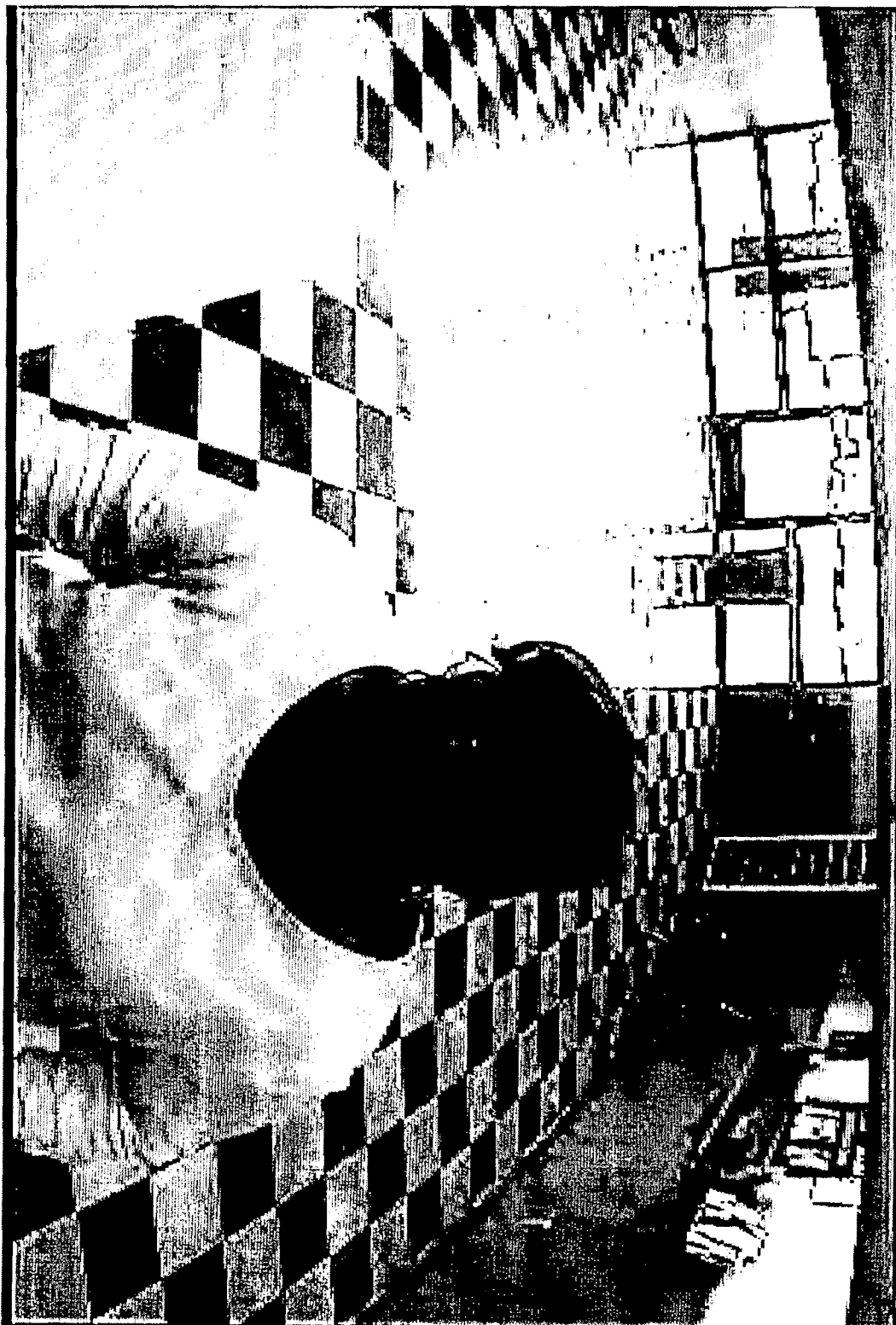
  
\_\_\_\_\_  
Ryan McDougal  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 30th day of September, 2005.

  
\_\_\_\_\_  
Theresa A. Goldner  
United States Magistrate Judge

2 Pickups

Tanya Randle



Diver name:  
MAC address:  
Recording mode:  
Camera name:  
Date and time:  
Events:

DIVAR-01  
00-04-63-07-0D-D9  
Continuous  
CUSTOMER VIEW  
09-21-2005 11:57:20  
None

Camera input:  
Unique ID:  
Image size:  
Compression:  
Image format:  
Authenticity:

2  
7542761  
720(H) x 486(V)  
0.30 bps  
4:2:2 wavelet compressed  
Image is authentic



Issued At  
MONLY POWER H2030  
6112 MING RVT  
PERKINSFIELD ON 93507

8321166324-01

10/21/05

Country

UNITED STATES

UNITED STATES OF AMERICA

Pay on the

Five Hundred Sixty Five & 00/100 Dollars

Dollars \$ 565.00

Total sum of

4041870000

4041870000  
Large sum \$1,000

Region and

2-20-05

MITCHELL

System Under Internal Review, Inc.  
By *Kendrick*

Kendrick A. Palmer, Chief Executive Officer

Printed in the United States of America  
(Instruments N.A. Patent Application 5,524,444)

1021001001 101032116632401

DIVAR name: DIVAR-01  
MAC address: 00-04-63-07-0D-D9  
Recording mode: Continuous  
Camera name: CHECK TARGET  
Date and time: 09-21-2005 11:57:20  
Events: None

Camera input: 1  
Unique ID: 7542762  
Image size: 720(H) x 486(V)  
Compression: 0.65 bpp  
Page 24 of 24  
Image format: 4:2:2 wavelet compressed  
Authenticity: Image is authentic

**WESTERN  
UNION**

Pay to the order of  
Cash or  
The sum of  
Dollars and  
Cents

**DR. CALIFORNIA**  
IDENTIFICATION CARD  
53551793  
VALID UNTIL 12/31/03  
11/2/04

001 102900  
001 003009

8821166323

09/21/07

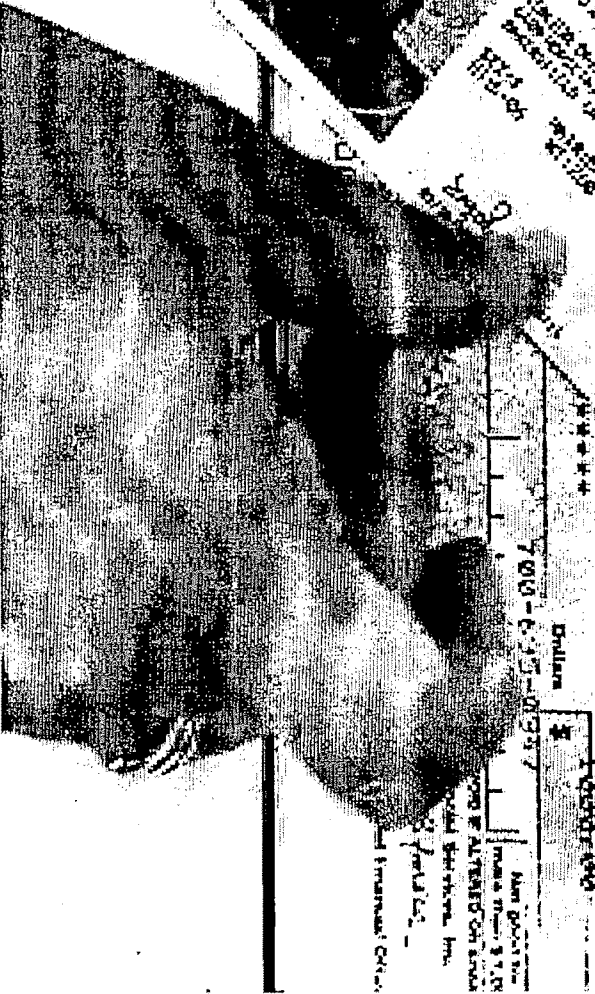
700-635-0937

Dollar

10/01/07

Make good on  
this money order  
or it will be void.

Payable at Western Union



Divar name: DIVAR-01  
MAC address: 00-04-63-07-0D-D9  
Recording mode: Continuous  
Camera name: CHECK TARGET  
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Events: None

Camera input: 1  
Unique ID: 7542774  
Image size: 720(H) x 486(V)  
Compression: 0.49 bpp  
Page 25  
Authenticity: 4:2:2 wavelet compressed  
Image is authentic

**WESTERN  
UNION**

Issued At

MONDAY MAIL REGNO  
ALL WINDS OFF  
BANKRUPTCY CR 00000

8821166323

03/21/05

Cash 1 of 2

Pay to the ORDER OF

The Sum of One Thousand & 00/100ths and no/100ths

Order for WASHINGTON DC 9-20-05

Dollars \$ 2,000.00

700-690-0507

WICH TO ENGINE WPO or AUSTIN 500000

Western Union Federal Services Inc.  
or Kennedy 500000

Kennedy & Kennedy, United Financial Co.

121021004000 3048321166323

Divar name: DIVAR-01  
MAC address: 00-04-63-07-0D-D9  
Recording mode: Continuous  
Camera name: CHECK TARGET  
Date and time: 09-21-2005 11:57:22  
Events: None

Camera input: 1  
Unique ID: 754276E  
Image size: 720(H) x 486(V)  
Compression: 0.60 bpp  
Image format: 4:2:2 wavelet compressed  
Authenticity: Image is authentic

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

Stanley Bernard Lewis

CASE NUMBER: 5:05-mj-00086 TAG

## CRIMINAL COMPLAINT

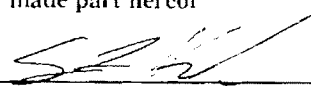
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 1, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
Signature of Complainant Sean Kaul,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

October 3, 2005

at

Bakersfield, California

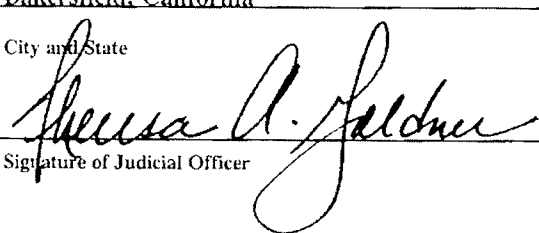
Date

at 11:20 a.m. TAG

City and State

U.S. Magistrate Judge Theresa A. Goldner

Name and Title of Judicial Officer

  
Signature of Judicial Officer



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Stanley Bernard Lewis

AFFIDAVIT

1. I, Sean L. Kaul, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have also been advised by other FBI agents who interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed the FBI that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. I have been informed by Red Cross

officials that funds are transferred from the Red Cross bank account in Chicago, Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed the FBI that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed the FBI that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed the FBI that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed the FBI that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint.

11. Red Cross officials have informed the FBI that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living.

expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: Stanley Bernard Lewis

12. On or about October 1, 2005, I was contacted at the Bakersfield FBI office by the owner of the Vest Market, 1831 Chester Avenue, Bakersfield, California. The owner advised that an unknown male, later identified as Stanley Lewis, had entered the Vest Market and was attempting to utilize Western Union transaction number 1-AQAZR0930 to receive Hurricane Katrina relief funds from the Red Cross in the name of Mike Johnson, 306 Melanice La, City Gray, Louisiana. The owner advised that the unknown male was suspicious and was unable to provide identification. The owner further believed this individual was not Mike Johnson.

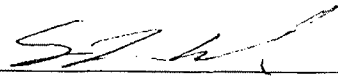
13. I responded to Vest Market and made contact with Stanley Bernard Lewis, born 1/22/1961. Lewis was in possession of a Western Union money request form in the name of Mike Johnson. After interviewing Lewis, I learned Lewis had attempted to gain funds through Western Union in the name of Mike Johnson, an individual unknown to Lewis. Lewis advised that he was born in Santa Monica, California and he later relocated to Bakersfield, California where he has lived since he was a young boy. Lewis is not from Louisiana nor was Lewis in or around Louisiana during Hurricane Katrina. Based upon the above information, I believe that Lewis was not a Hurricane Katrina victim and, therefore, was not eligible to receive relief funds from the Red Cross.

14. I am also familiar with the payment system in place between the Red Cross and Western Union. I have been informed that each time a claim number is presented at a Western Union branch that Western Union performs an electronic verification to confirm the PIN represents a Red Cross claim for payment. I have been informed by Western Union representatives that such inquiries are transmitted electronically (by means of a wire communication) to one of two Western Union database/computer record centers located in the states of Texas and Missouri for the purposes of verifying the transaction. Upon completing the verification, the request is electronically forwarded to the Western Union Center located in Charlotte, North Carolina, where the Red Cross funds are released.

*A SEE ATTACHED PARAGRAPHS 15 AND 16, INCORPORATED HEREIN BY Reference.*  
Based on the above information I believe that probable cause exists to conclude that on October 1, 2005 Stanley Lewis attempted to received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343. *SPH*  
*fas*

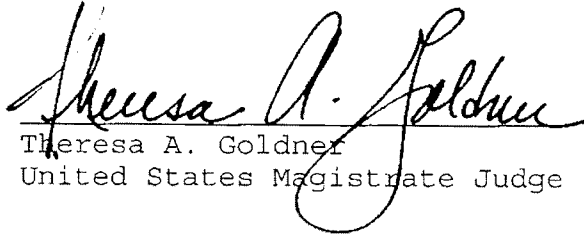
Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, Stanley Lewis, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.



Sean Kaul  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 3rd day of October, 2005.



Theresa A. Goldner  
United States Magistrate Judge

ATTACHED PARAGRAPHS 15 and 16 TO AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

15. I have been informed that in order to produce a PIN number, an employee at the Red Cross call center in Bakersfield, California must access the internet and Choice Point, as described in Paragraph 10 above, to verify that the person is a Hurricane Katrina victim, thereby resulting in interstate communication.
16. I interviewed Stanley Lewis when I made contact with him on October 1, 2005. Prior to interviewing Stanley Lewis, I advised him of his Miranda rights, and he waived those rights in writing. During the interview, Stanley Lewis admitted that he had communicated with a call center employee who had provided him with the above name and claim PIN number. Based upon this admission, Stanley Lewis aided and abetted the call center employee in making an interstate communication in furtherance of the fraud.

SLK  
SLK

*This Page 3-A was sworn to before me, and  
subscribed in my presence, as part of the  
Affidavit in Support of Criminal Complaint,  
this 3rd day of October, 2005.*

*Sherrisa A. Feldner  
U.S. Magistrate Judge*

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

Sheena Monae Porter

CASE NUMBER: **5:05-mj-000 88 TAG**

## CRIMINAL COMPLAINT

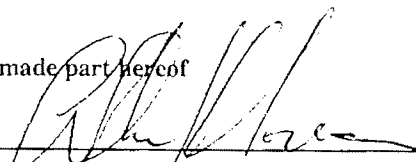
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 1, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
\_\_\_\_\_  
Signature of Complainant Anthony K. Sorensen,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence

October 3, 2005

at

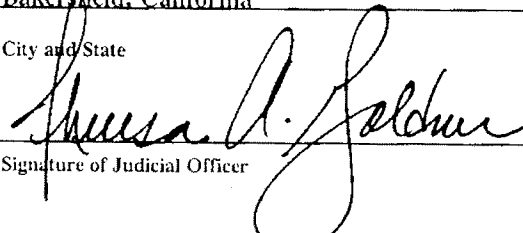
Bakersfield, California

Date

at 2:08 p.m.

City and State

U.S. Magistrate Judge Theresa A. Goldner  
\_\_\_\_\_  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Sheena Monae Porter

AFFIDAVIT

1. I, Anthony K. Sorensen, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed the FBI that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. Red Cross officials have informed the FBI that funds are transferred from the Red Cross bank account in

Chicago, Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed the FBI that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed the FBI that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed the FBI that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed the FBI that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint. After the information is verified through Choicepoint, the recipient's information is entered into the Red Cross processing system using an internet browser connection and a claim number is generated, thereby resulting in interstate communication. Specifically, I have been informed by Red Cross officials that each specific claim number is generated and transmitted in the Red Cross processing center located at Falls Church, Virginia. Therefore, every claim number sent to the Red Cross call center in Bakersfield, California is an interstate wire communication.



11. Red Cross officials have informed the FBI that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: Sheena Monae Porter

12. On or about October 1, 2005, Khaled Shakta, manager of the Fast Stop, 1700 Niles Street, contacted the Bakersfield FBI office. Shakta advised that an unknown female, later identified as Miko Shannia Nobles, had entered the Fast Stop Market and was attempting to utilize Western Union transaction number 1-B7QFO101001 to receive Hurricane Katrina relief funds from the Red Cross in the name of Tina Brown. Shakta advised that the female was trying to obtain funds from the Red Cross and he did not believe that she was a real victim.

13. I responded to the Fast Stop Market and made contact with Miko Shannia Nobles, born 2/13/1983. Nobles informed me that she had been given the unique claim number by Sheena Porter, her friend who works at the Red Cross call center. Nobles stated that Porter had done this three other times and had called and asked Nobles to help her collect \$1565. It should be noted that Porter and Nobles were traveling in the same vehicle together.

14. I asked Sheena Porter if she worked at the Red Cross call center and she said that she does not know anything about the Red Cross. I then showed my FBI credentials to Porter and explained to her that it is against the law to lie to a federal agent. I explained to Porter that I had been working with the Red Cross and could find out if she works there at the Red Cross call center. Porter admitted that she worked at the call center but stated that she had no idea how Nobles got the unique claim number and was just giving her a ride. Later inquiry with Red Cross showed that claim number 1-B7QFO101001 was processed by Sheena Monae Porter at 3:15pm on 10/1/2005. This claim was in the name of Tina Brown, the same name that Nobles was using in attempt to claim the funds. Based upon this statement, I believe Porter provided the above referenced claim number to Miko Shannia Nobles for the purpose of submitting the false claim to Western Union and engaging in Wire Fraud.

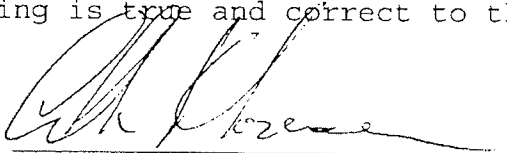
15. I am familiar with the payment system in place between the Red Cross and Western Union. I have been informed that each time a claim number is presented at a Western Union branch that

Western Union performs an electronic verification to confirm the PIN represents a Red Cross claim for payment. Western Union representatives have informed the FBI that such inquiries are transmitted electronically (by means of a wire communication) to one of two Western Union database/computer record centers located in the states of Texas and Missouri for the purposes of verifying the transaction. Upon completing the verification, the request is electronically forwarded to the Western Union Center located in Charlotte, North Carolina, where the Red Cross funds are released.

Based on the above information I believe that probable cause exists to conclude that on October 1, 2005 Sheena Monae Porter attempted to received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

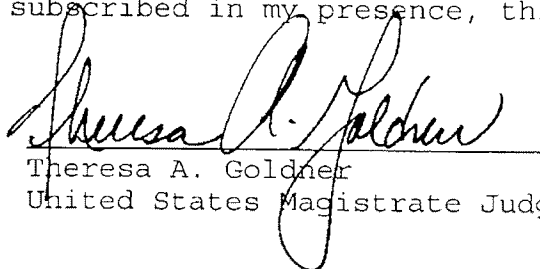
Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, Sheena Monae Porter, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.



Anthony K. Sorensen  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 3rd day of October, 2005.



Theresa A. Goldner  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

oOo

UNITED STATES OF AMERICA

v.

Miko Shannia Nobles

CASE NUMBER: **5:05-mj-00087 TAG**

## CRIMINAL COMPLAINT

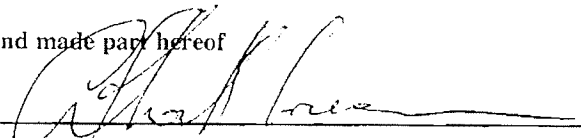
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 1, 2005, in the County of Kern, State and Eastern District of California, and elsewhere, the defendant did,

► Devise and intend to devise a scheme and artifice to defraud, or for obtaining money by false and fraudulent pretenses and representations, and did transmit or cause to be transmitted in interstate communications by means of wire or radio, including but not limited to telephone and other methods, a writing, sign, signal or sound for the purpose of executing such scheme and artifice to defraud and to obtain money by false and fraudulent pretenses,

in violation of Title 18, United States Code, Section(s) 1343. I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

► Please see attached affidavit which is on the attached sheet and made part hereof

  
Signature of Complainant Anthony K. Sorensen,  
Special Agent, Federal Bureau of Investigation

Sworn to before me, and subscribed in my presence on

October 3, 2005

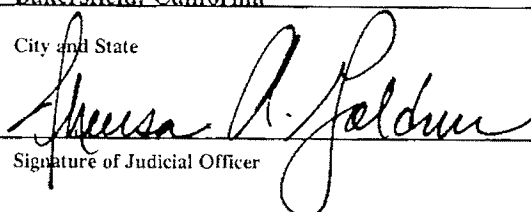
at

Bakersfield, California

Date at 2:05 p.m.

City and State

U.S. Magistrate Judge Theresa A. Goldum  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

County of Kern

RE: In support of  
Criminal Complaint

Miko Shannia Nobles

AFFIDAVIT

1. I, Anthony K. Sorensen, being duly sworn, hereby depose and state as follows:

INTRODUCTION:

2. I have been involved in all aspects of this investigation or have been advised of the specific details of the investigation by other FBI agents. During the course of this investigation I have interviewed and obtained information from officials with the American Red Cross and Spherion.

3. From approximately August 25, 2005 to August 29, 2005, a catastrophic hurricane (hereinafter Hurricane Katrina) struck the gulf coast (from Florida to and including Louisiana) of the United States. The damage caused by Hurricane Katrina was unprecedented and resulted in the displacement of numerous residents of the affected area.

4. I have learned during this investigation that, in an effort to provide financial assistance to Hurricane Katrina victims, numerous relief agencies have become involved in administering relief funds and donations, for use by Hurricane Katrina victims and intended to be utilized for day to day living expenses (food, lodging, clothing and other necessities of life).

5. One of the relief agencies responsible for the administration of relief funds as set forth above is the American Red Cross (hereinafter the Red Cross). Relief funds available through the Red Cross are originally maintained in a bank account in Chicago Illinois.

6. Red Cross officials have informed the FBI that, in order to distribute relief funds, the Red Cross has arranged with Western Union to distribute such funds. Western Union maintains various branches throughout the United States, including but not limited to Kern County and other various counties within the State and Eastern District of California. Such branches are commonly located in convenience stores such as Fastrip and 7-11 stores for instance. Red Cross officials have informed the FBI that funds are transferred from the Red Cross bank account in

Chicago, Illinois, to Western Union and its various branches via wire transfers that are made in interstate commerce and occur between state lines.

7. Red Cross officials have also informed the FBI that, shortly after Hurricane Katrina struck the United States, the Red Cross set up a nationwide call center located in Bakersfield, California, which is within the State and Eastern District of California, for the purpose of assisting eligible hurricane Katrina victims (hereinafter claimants) in obtaining and receiving relief funds as described in paragraph four above.

8. Red Cross officials have informed the FBI that the call center in Bakersfield, California, is the largest of two national call centers set up by the Red Cross to field calls from victims of Hurricane Katrina. The call center in Bakersfield, California, is manned by temporary workers employed by Spherion, a staffing services company.

9. Red Cross officials have informed the FBI that the purpose of the call center is to distribute relief funds to victims who were in the direct path of the hurricane, and who may have been forced or otherwise required to evacuate their homes. When claimants who were victims of the disaster contact the call center they are asked questions to verify that they are eligible for relief. These questions include questions concerning the claimants place of residence, including zip code, at the time Hurricane Katrina struck the United States.

10. Red Cross officials have informed the FBI that Hurricane Katrina victims are verified as eligible to receive Red Cross disaster relief funds after their pre-disaster address has been verified as within the zip codes determined by Red Cross to be affected by Katrina. If the victim claims to be from an affected zip code, call center employees are instructed to check the victim's address in Choicepoint to validate it. Choicepoint is a business that provides information, typically via the Internet, including confirmation of a named persons's address. This information is based upon a public records compilation maintained by ChoicePoint. After the information is verified through Choicepoint, the recipient's information is entered into the Red Cross processing system using an internet browser connection and a claim number is generated, thereby resulting in interstate communication. Specifically, I have been informed by Red Cross officials that each specific claim number is generated and transmitted in the Red Cross processing center located at Falls Church, Virginia. Therefore, every claim number sent to the Red Cross call center in Bakersfield, California is an interstate wire communication.

11. Red Cross officials have informed the FBI that if it is determined that a claimant is eligible for relief, the claimant is given a unique claim number they can use to claim money from any Western Union store nationwide. The amount of money claimants are provided is determined by the size of their family. A single claimant is entitled to \$360, whereas a claimant with a family of five or more is entitled to \$1565. These funds are intended to assist displaced victims/claimants with day-to-day living expenses, rather than pay for actual property damage or loss.

PROBABLE CAUSE FOR NAMED DEFENDANT: Miko Shannia Nobles

12. On or about October 1, 2005, Khaled Shakta, manager of the Fast Stop, 1700 Niles Street, contacted the Bakersfield FBI office. Shakta advised that an unknown female, later identified as Miko Shannia Nobles, had entered the Fast Stop Market and was attempting to utilize Western Union transaction number 1-B7QF0101001 to receive Hurricane Katrina relief funds from the Red Cross in the name of Tina Brown. Shakta advised that the female was trying to obtain funds from the Red Cross and he did not believe that she was a real victim.

13. I responded to the Fast Stop Market and made contact with Miko Shannia Nobles, born 2/13/1983. Nobles informed me that she had been given the claim number by her friend Sheena Porter who works at the call center. Nobles stated that Porter had done this three other times and had called and asked Nobles to help her collect \$1565. Upon a post arrest interview with Nobles and after she was advised of her Miranda rights and agreed to waive those rights in writing, Nobles informed me that she was going to pay Porter \$600 and Nobles was going to keep the remaining \$965. When I asked Nobles if she had ever lived in Louisiana she said, "Hell no." I also asked her if she was entitled to the money she also responded, "Hell no." Based upon the above information, I believe that Nobles was not a Hurricane Katrina victim and, therefore, was not eligible to receive relief funds from the Red Cross. Based upon this admission, Miko Shannia Nobles aided and abetted the call center employee in making an interstate communication in furtherance of the fraud.

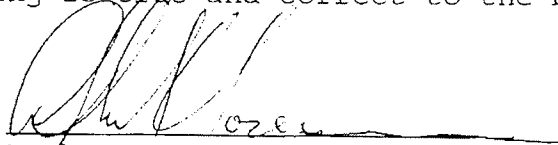
14. I am also familiar with the payment system in place between the Red Cross and Western Union. I have been informed that each time a claim number is presented at a Western Union branch that Western Union performs an electronic verification to confirm the PIN represents a Red Cross claim for payment. Western Union representatives have informed the FBI that such inquiries are transmitted electronically (by means of a wire communication) to one of two Western Union database/computer record centers located in the states of Texas and Missouri for the purposes of verifying the transaction. Upon completing the

verification, the request is electronically forwarded to the Western Union Center located in Charlotte, North Carolina, where the Red Cross funds are released.

Based on the above information I believe that probable cause exists to conclude that on October 1, 2005 Miko Shannia Nobles attempted to received funds from an on-going fraud scheme through and involving an interstate wire transfer in violation of Title 18, United States Code, Section(s) 1343.

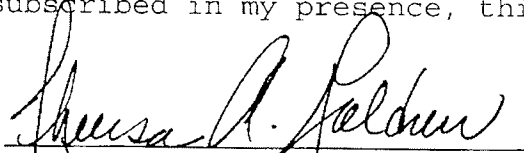
Wherefore, based upon the facts and circumstances and information, I submit there is probable cause to believe that defendant, Miko Shannia Nobles, has violated Title 18, United States, Code, Section 1343, which makes it a crime to participate in a scheme to defraud by the use of interstate communications.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.



Anthony K. Sorensen  
Special Agent, Federal Bureau  
Of Investigation

Sworn to before me, and subscribed in my presence, this 3rd day of October, 2005.



Theresa A. Goldner  
United States Magistrate Judge